

EXHIBIT D

THE ZHP PARTY DEPOSITION PROPOSAL

No.	Witness	Party	30(b)(6)?	Locale	12/8/2020 Proposal ¹	1/5/2021 Proposal
1.	John Iozzia	Huahai US	No	U.S.	January 20-22	January 20 (confirmed)
2.	Lijie Wang	Prinston	Yes	U.S.	January 26, 28, 29	January 26 (confirmed)
3.	Remonda Gergis	Prinston	No	U.S.	February 2-4	February 2 (confirmed)
4.	Hai Wang	Solco	Yes	U.S.	February 16, 17, 18	February 11
5.	Jun Du	ZHP/Prinston/ Huahai US	No	U.S.	March 10, 11	February 17
6.	Minli Zhang	ZHP	Yes	Hong Kong	March 16-17	March 2-3
7.	Qiangming Li	ZHP	Yes	Hong Kong	March 18-19	March 4-5
8.	Xiaodi Guo	Prinston	No	To be determined	N/A ²	March 4-5
9.	Eric Tsai	Prinbury BioPharm	No	Hong Kong	N/A	March 8-9
10.	Eric Gu	SynCores	Yes	Hong Kong	March 11-12	March 9-10
11.	Lucy Liu	ZHP	No	Hong Kong	N/A	March 10-11
12.	Jucai Ge	ZHP	Yes	Hong Kong	March 31-April 1	March 11-12
13.	Linda (Lihong) Lin	ZHP	Yes	Hong Kong	March 4-5	March 16-17
14.	Yuelin Hu	ZHP	No	Hong Kong	N/A	March 16/17
15.	Min Li	ZHP	Yes	Hong Kong	March 24-25	March 18-19

¹ See ECF No. 655-4.

² “N/A” reflects witnesses proposed by Plaintiffs after December 8, 2020, and whose depositions will be subject to a forthcoming motion for protective order by the ZHP Parties.

No.	Witness	Party	30(b)(6)?	Locale	12/8/2020 Proposal¹	1/5/2021 Proposal
16.	Karen Xu	ZHP	No	Hong Kong	N/A	March 18-19
17.	Xavier Tang	ZHP	No	Hong Kong	N/A	March 24-25
18.	Jay (Jie) Wang	ZHP	Yes	Hong Kong	March 2-3	March 24-25
19.	Peng Dong	ZHP	Yes	Hong Kong	March 8-9	March 30-31
20.	Baohua Chen	ZHP	No	Hong Kong	N/A	April 1